

COMPOSITE EXHIBIT 9



Scott St John (public) <j.scott.stjohn.public@gmail.com>

CRT - St. John Deposition

Scott St John (public) <j.scott.stjohn.public@gmail.com>

Wed, Oct 14, 2015 at 11:58 AM

To: Bob Gralewski <bgralewski@kmlp.com>

Cc: andrea.valdez.esq@gmail.com

Mr. Gralewski,

Please see the attached correspondence.

Best regards,
Joseph S. St. John



2015.10.14 St. John to Gralewski re Deposition Scheduling.pdf

98K

Joseph Scott St. John
Attorney-at-Law

October 14, 2015

514 Mockingbird Drive
Long Beach, MS 39560

jscottstjohnpublic@gmail.com

Via Electronic Mail

Robert J. Gralewski, Jr.
Kirby McInerney LLP
600 B Street, Suite 1900
San Diego, CA 92101

bgralewski@kmlp.com

Re: ***In re Cathode Ray Tube (CRT) Antitrust Litigation,***
Master File No. No. 3:07-cv-5944 SC, MDL No. 1917 (N.D. Cal.)

Mr. Gralewski:

Further to yesterday's conversation, I write regarding the scheduling of your deposition of my client, absent class member Douglas W. St. John.

First, after additional consultations with my client, I understand that he is scheduled to serve as a poll manager for the November 3, 2015, Mississippi General Election. That civic duty requires his physical presence at the poll from 7 a.m. until 7 p.m. on November 3, with additional hours spent setting up the poll and transporting ballots to the courthouse.

In view of my client's age and the extraordinarily long day he anticipates on November 3, I ask that you minimize the substantial burden you are imposing by setting his deposition for November 2 or November 5.

Second, please promptly confirm in writing your representation that Mr. St. John's deposition will be limited to no more than two hours. *Cf.* Special Master's Amended Order, *In re TFT-LCD (Flat Panel) Antitrust Litigation*, No. 07-civ-1827 (D.E. 7011) (N.D. Cal. Oct. 19, 2012) at ¶ 5, *adopted in relevant part* (D.E. 7152) (N.D. Cal. Nov. 14, 2012). Additionally, to avoid the need for motion practice, please confirm in writing that (a) the expenses of the deposition will be paid by IPP Counsel, and (b) the deposition will be limited to Mr. St. John's standing as a class member, factual support for his objection, whether he has objected in other cases, and if so, the circumstances surrounding such objections. *Id.*

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Third, for the avoidance of doubt, Mr. St. John will not be deposed voluntarily; he will appear only pursuant to a valid subpoena. Mr. St. John reserves the right to object to any such subpoena.

Please don't hesitate to contact me with any questions or concerns. I look forward to your prompt response.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. St. John", written in a cursive style.

Joseph Scott St. John